

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

INDEX# 15-CV-3270

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MARIE M. JOSIANNE SAJOUS, on behalf of herself
and others similarly situated,

Plaintiffs,

-against-

SOUTHERN WINE & SPIRITS OF NEW YORK, INC. and
WINE, LIQUOR & DISTILLERY WORKERS LOCAL 1-D,

Defendants.
-----x



1225 Franklin Avenue
Garden City, New York

October 25, 2016

11:29 a.m.

Deposition of the Non-Party Witness
JOHN WILKINSON, pursuant to Agreement, before
Robert S. Barletta, a Notary Public of the State
of New York.

October 25, 2016

1 Wilkinson

2 Q. Nothing to do with her blurting out to
3 her subordinates she believes there was sex
4 discrimination going on in her department?

5 A. It had everything to do with the fact
6 this is the way we do it at other sites.

7 Q. Who does she supervise now?

8 A. Nobody.

9 Q. What was the timing of that? When did
10 that change?

11 A. When we went to WMI.

12 Q. What is WMI?

13 A. A computer software package controlling
14 inventory in warehouse.

15 Q. Something that was used at Empire?

16 A. I don't know if they have a WMI system.
17 They might. I don't know.

18 Q. When was the WMI implemented?

19 A. July. The middle of July.

20 Q. Of 2016?

21 A. 2016.

22 Q. Was that the same time that Maria
23 Suarez's disciplinary authority was taken away or
24 done earlier?

25 A. No, that was when it was taken away.

1 Wilkinson

2 Q. Did Maria Suarez ever ask you why her
3 disciplinary authority was being taken away?

4 A. No, we explained to her. We explained
5 to her up front. This is the way the structure
6 works. This is the way it is done at our other
7 facility.

8 Q. Which other facilities?

9 A. Upstate, New York.

10 Q. Upstate, New York is done like that?

11 A. Yes.

12 Q. How did you know that?

13 A. Because we were instructed and informed.
14 This is the way we do it upstate. This is the way
15 we are doing it downstate.

16 Q. Who told you that?

17 A. My boss.

18 Q. What was his name?

19 A. Kevin Randall.

20 Q. Do you know in fact, other than hearing
21 from Mr. Randall do you have any other reason to
22 believe this is the way they do it in Upstate New
23 York?

24 A. No.

25 Q. What other basis do you have for

1 Wilkinson
2 believing this is the way they do it in Upstate
3 New York?

4 A. Other managers and the person who does
5 WMI Upstate, New York. I know her and I have
6 spoken to her. That is the way they do it.

7 Q. For the practical reasons for taking
8 away the disciplinary authority, could you explain
9 those to me?

10 A. No, I cannot.

11 Q. Did Kevin Randall explain those to you?

12 A. As I said, just because that is the way
13 it is done.

14 Q. Other than that, there is no real reason
15 behind it?

16 A. There was something I am sure that has
17 to do with separation of responsibilities.
18 Remember, you are dealing with a software system.

19 MR. MOSER: Nothing further. Thank you.

20 THE REPORTER: Who would like a copy of
21 the transcript?

22 MR. MOSER: I would.

23 MR. THORELL: I would.

24 MR. MANGAN: I would.

25 (Time noted: 2:19 p.m.)